

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**CAROLYN PLACHT, on behalf of the
Symbria Inc. Employee Stock Ownership
Plan and on behalf of a class of all other
persons similarly situated,**

Plaintiff,

v.

**ARGENT TRUST COMPANY,
JILL KRUEGER,
THOMAS NOESEN, JR.,
JOHN R. CALLEN,**

Defendants.

Case No. 1:21-cv-05783

Hon. Ronald A. Guzman

Hon. Beth W. Jantz

JOINT STATUS REPORT AND PROPOSED SCHEDULE FOR EXPERT DISCOVERY

In accordance with the Court's September 6, 2022 minute entry (Dkt. 78), Plaintiff Carolyn Placht, on behalf of the Symbria Inc. Employee Stock Ownership Plan, and similarly situated participants in the Plan and their beneficiaries ("Plaintiff"), and Defendants Argent Trust Company ("Argent"), Jill Krueger ("Krueger"), Thomas Noesen, Jr. ("Noesen"), and John R. Callen ("Callen"), submit the following joint status report with proposed schedule to conduct expert discovery.

Pursuant to the Court's February 4, 2022 minute entry (Dkt. 40), the parties are on schedule to complete fact discovery by December 5, 2022.

The parties propose the following schedule to complete expert discovery:

- (i) Plaintiff's disclosure of the identities of expert witnesses and their disclosures required by Fed. R. Civ. P. 26(a)(2)(A)-(C): on or before February 17, 2023;

- (ii) Defendants' disclosure of the identities of expert witnesses and their disclosures required by Fed. R. Civ. P. 26(a)(2)(A)-(C), and any rebuttal reports to Plaintiff's opening disclosures: on or before April 7, 2023
- (iii) Plaintiff's rebuttal reports to Defendants' opening disclosures: on or before May 26, 2023; and
- (iv) Depositions of experts completed by July 14, 2023.

Dated: November 9, 2022

Respectfully submitted,

BAILEY & GLASSER LLP

/s/ Patrick Muench

Patrick O. Muench
318 W. Adams Street
Suite 1512
Chicago, IL 60606
Telephone: (312) 500-8680
Facsimile: (304) 342-1110
pmuench@baileyglasser.com

Ryan T. Jenny
Gregory Y. Porter (*pro hac vice*)
Laura E. Babiak (*pro hac vice*)
1055 Thomas Jefferson Street, NW
Suite 540
Washington, DC 20007
Telephone: (202) 463-2101
Facsimile: (202) 463-2103
rjenny@baileyglasser.com
gporter@baileyglasser.com
lbabiak@baileyglasser.com

Attorneys for Plaintiff

/s/ Michael J. Scotti, III

Michael John Scotti, III
Joseph Ramos
Roetzel & Andress LPA
30 N. LaSalle Street
Suite 2800
Chicago, IL 60602
(312) 580-1200
mscotti@ralaw.com
jramos@ralaw.com

Attorney for Defendant John Callen

/s/ Michael L. Scheier

Michael L Scheier
Jacob Deniro Rhode
Keating, Muething & Klekamp
1 East 4th Street
Suite 1400
Cincinnati, OH 45202
(513) 579-6952
mscheier@kmklaw.com
jrhode@kmklaw.com

Ross David Taylor
Keating Muething & Klekamp PLL
125 S. Clark Street
17th Floor
Chicago, IL 60603
(513) 639-3935
rtaylor@kmklaw.com

*Attorneys for Defendants Jill Kreuger and
Thomas Noesen*

/s/ Gregory Jacob

Gregory Jacob
Shannon M. Barrett
Deanna Marie Rice
O'Melveny & Myers LLP
1625 I St NW
Washington, DC 20006
(202) 383-5308
gjacob@omm.com
sbarrett@omm.com
Derice@omm.com

Jeffrey Andrew Soble
John R. Landis
Samantha Ann Sadler
Foley & Lardner
321 North Clark
Street Suite 2800
Chicago, IL 60654
(312) 832-4500
jsoble@foley.com
jrlandis@foley.com
ssadler@foley.com

Michael S. Shapiro
Tomlinson & Shapiro, P.C.
8501 W. Higgins Road
Suite 420
Chicago, IL 60631
(312) 715-8770
mss@tomlinsonshapiro.com

*Attorneys for Defendant Argent Trust
Company*